UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION

IN RE: ETHICON, INC., PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY   MDL No. 2327
LITIGATION

THIS DOCUMENT RELATES TO ALL CASES

MOTION TO SUBSTITUTE COUNSEL

PLEASE TAKE NOTICE that the law firm of Eisenberg Gilchrist & Cutt ("EGC")

respectfully moves this Court for entry of an order substituting Attorney Sarah Wade in place of

Attorney Jeff Sbaih in this MDL and each individual member case in which Eisenberg Gilchrist

& Cutt is listed as counsel for Plaintiff. The following is offered in support of this motion:

1. Attorney Jeff Sbaih (Utah Bar No. 14014) of EGC entered an appearance in this
   MDL on behalf many plaintiffs asserting claims against Ethicon.

2. Attorney Jeff Sbaih is relocating out-of-state with his family, and his last day of
   employment with Eisenberg Gilchrist & Cutt will be October 21, 2016.

3. The court should allow Attorney Jeff Sbaih to withdraw as counsel of record for those
   cases in which he has entered an appearance, to which Attorney Jeff Sbaih consents.

4. In his place, Attorney Sarah Wade (Utah Bar No. 15477) of Eisenberg Gilchrist &
   Cutt requests that she be substituted as counsel of record in those cases which
   Attorney Jeff Sbaih appeared as counsel.

5. The law firm of Eisenberg Gilchrist & Cutt and Attorney David Cutt (Utah Bar No.
   5937) will continue acting as counsel of record in all the cases in which Jeff Sbaih

appeared as counsel, and will work jointly with Attorney Sarah Wade in prosecuting these cases.

Accordingly, the court should grant this motion and enter an order (1) allowing attorney Jeff Sbaih to withdraw as counsel in this MDL and each individual member case in which EGC is listed as counsel for Plaintiff, and (2) allow attorney Sarah Wade to be substituted as counsel in place of Attorney Jeff Sbaih in this MDL and each individual member case in which EGC is listed as counsel for Plaintiff.

DATED: October 18, 2016.

EISENBERG GILCHRIST & CUTT

Jeff M. Sbaih

Sarah M. Wade